

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Cerro Flow Products, Inc  
Bossier City, Bossier Parish, Louisiana  
Agency Interest Number: 40993  
Activity Number: PER20090001  
Proposed Permit Number: 0400-00051-V4**

**I. APPLICANT**

**Company:**

Cerro Flow Products, Inc  
5007 Hazel Jones Rd  
Bossier City, Louisiana 71111

**Facility:**

Cerro Flow Products, Inc  
5007 Hazel Jones Rd  
Bossier City, Bossier Parish, Louisiana  
Approximate geographic coordinates: 93° 39' 30" West, 32° 30' 0" North.

**II. FACILITY AND CURRENT PERMIT STATUS**

Cerro produces copper tubing from pure copper. This operation includes the following processes: annealing under inert atmosphere; solvent degreasing; and storage of oily water.

The solvent station uses pure mineral spirits. Cerro also charges (fills) copper coils with R404R Freon refrigerant.

The inert atmosphere is produced by the combustion of natural gas in an oxygen deficient atmosphere to produce a mixture of N<sub>2</sub>, CO, CO<sub>2</sub>, H<sub>2</sub>O and H<sub>2</sub>. The inert gas is used to blanket the annealing furnaces and prevent oxidation of the copper. The combustion only occurs in the center stack(s) of the furnaces.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application and Emission Inventory Questionnaire were submitted by Cerro Flow Products Inc on January 9, 2009 requesting a Part 70 operating permit.

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**Project**

Cerro Flow proposes to renew the Part 70 Permit for its facility located in Bossier City.

**Proposed Permit**

Permit 0400-00051-V4 will be the renewal of the Part 70 operating permit for the Cerro Flow Products facility located in Bossier City.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	0.16	0.16	-
SO <sub>2</sub>	0.016	0.02	+0.004*
NO <sub>x</sub>	2.20	2.20	-
CO	201.96	201.96	-
VOC	3.78	4.00	+ 0.22*

\*These increases in emissions represent a change in the emission factors used to calculate these estimates and do not reflect a modification at the facility.

**IV REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

**Applicability and Exemptions of Selected Subject Items**

ID No.	Requirement	Note
Entire Facility	Compliance Assurance Monitoring [40 CFR 64]	DOES NOT APPLY. No control devices are installed. [40 CFR 64.2(a)]
EQT 7, 9, & 10 Annealing Furnace # 3	Control of Emissions of Smoke [LAC 33:III.1101.B]	EXEMPT. Sources EQT 9 and 10 are the combustion units of Furnace No. 3. The exhaust stacks are manifolded with the EQT 7 stack. The Opacity requirement can only be observed at EQT 7, which has no direct combustion unit.

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EQT 2, 8-9 Annealing Furnace # 2 & # 3	Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A]	EXEMPT. Units emit less than 5 tons of SO <sub>2</sub> per year. [LAC 33:III.1502.A.3]
EQT 4 & 5 Oil/Water Separator Tanks # 1 & 2	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60, Subpart Kb]	DOES NOT APPLY. Storage Capacity less than 75 cubic meters. [40 CFR 60.110b(a)]
	Oil / Water - Separation [LAC 33:III.2109]	EXEMPT. Separators emit less than 100 tpy of VOC. Record and retain at the site for at least 2 years the data required to demonstrate compliance with or exemption from LAC 33:III.2109. [LAC 33:III.2109.B.4]
EQT 6 Solvent Degreasing Stations	Organic Solvents [LAC 33:III.2123 Subchapter B]	EXEMPT. The liquid cleaning stations do not exceed the 3.0 lbs/hr or 15.0 lbs/day emission rate. Record and retain at the site for at least 2 years the data required to demonstrate exemption from LAC 33:III.2123. [LAC 33:III.2123.A]
	Vapor Degreasers [LAC 33:III.2125]	DOES NOT APPLY. The liquid cleaning stations do not meet the definition of Vapor Degreaser.

**Prevention of Significant Deterioration/Nonattainment Review**

There are no actual emissions increases associated with this permit; therefore, a Prevention of Significant Deterioration review is not required.

**MACT Requirements**

This facility does not emit any LAC 33:III.Chapter 51 Toxic Air Pollutants; therefore, Maximum Achievable Control Technology (MACT) is not required.

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### **Air Quality Analysis**

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

### **General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

### **Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

## **V. PERMIT SHIELD**

There is no permit shield.

## **VI. PERIODIC MONITORING**

### **Compliance Assurance Monitoring (CAM) – 40 CFR 64**

Compliance Assurance Monitoring (CAM) in accordance with 40 CFR 64 is not required for this facility. The facility does not use any control devices in order to achieve compliance with any emission limitation.

## **VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

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New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.